

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

<div style="display: flex; justify-content: space-between;"> <div>TQ DELTA, LLC,</div> <div>Plaintiff,</div> </div> <div style="text-align: center;">v.</div> <div style="display: flex; justify-content: space-between;"> <div>ZHONE TECHNOLOGIES, INC.</div> <div>Defendant.</div> </div>	Civil Action No. 13-cv-1836-RGA
<div style="display: flex; justify-content: space-between;"> <div>TQ DELTA, LLC,</div> <div>Plaintiff,</div> </div> <div style="text-align: center;">v.</div> <div style="display: flex; justify-content: space-between;"> <div>ZYXEL COMMUNICATIONS, INC. and ZYXEL CORPORATION,</div> <div>COMMUNICATIONS Defendants.</div> </div>	Civil Action No. 13-cv-2013-RGA
<div style="display: flex; justify-content: space-between;"> <div>TQ DELTA, LLC,</div> <div>Plaintiff,</div> </div> <div style="text-align: center;">v.</div> <div style="display: flex; justify-content: space-between;"> <div>ADTRAN, INC.</div> <div>Defendant.</div> </div>	Civil Action No. 14-cv-954-RGA
<div style="display: flex; justify-content: space-between;"> <div>ADTRAN, INC,</div> <div>Plaintiff,</div> </div> <div style="text-align: center;">v.</div> <div style="display: flex; justify-content: space-between;"> <div>TQ DELTA, LLC.</div> <div>Defendant.</div> </div>	Civil Action No. 15-cv-121-RGA

FAMILY 8 PATENT JOINT CLAIM CONSTRUCTION CHART

Pursuant to ¶ 9 of the Court's Third and Final Scheduling Order, dated April 10, 2017, Plaintiff TQ Delta, LLC and Defendants in the above-captioned cases submit their Joint Claim Construction Chart ("Chart") for the Family 8 Patent (U.S. Patent No. 7,796,705 ("the '705 patent")).¹ The Chart attached as Exhibit A includes the parties' respective proposed constructions of the disputed language of the asserted claims of the Family 8 Patent. The Chart includes citations to the parties' intrinsic evidence in support of such constructions. For the

¹ The Family 8 Patent is not asserted against 2Wire LLC.

Court's reference, also included in Exhibit A are the parties' agreed to constructions for language of the asserted claims. The parties reserve their rights to amend and/or supplement their disclosures.

In addition to the Joint Claim Construction Chart attached as Exhibit A, a copy of the Family 8 Patent and additional portions of the intrinsic record are attached as Exhibit B-E:

Exhibit	Description
B	'705 patent
C	Prosecution History of '705 patent, Written Opinion of the International Searching Authority dated Feb. 8, 2006
D	U.S. Provisional Application No. 60,619,618
E	Prosecution History of Application No. 12/769,747, Notice of Allowance dated Aug. 18, 2014; Comments on Statement of Reasons for Allowance dated Nov. 3, 2014

Dated: September 22, 2017

FARNAN LLP

/s/ Michael J. Farnan

Michael J. Farnan (#5165)
Brian E. Farnan (#4089)
919 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 777-0300
(302) 777-0301 (Fax)
mfarnan@farnanlaw.com
bfarnan@farnanlaw.com

Attorneys for Plaintiff TQ Delta, LLC

Respectfully submitted,

SEITZ, VAN OGTROP & GREEN, P.A.

/s/ Jared T. Green

James S. Green, Sr. (#481)
Jared T. Green (#5179)
222 Delaware Avenue, Suite 1500
Wilmington, DE 19801
(302) 888-0600
(302) 888-0606
jgreen@svglaw.com
jtgreen@svglaw.com

Attorneys for Defendant Zhone Technologies, Inc.

MORRIS JAMES LLP

/s/ Kenneth L. Dorsney

Kenneth L. Dorsney (#3726)
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
(302) 888-6800
(302) 571-1750
kdorsney@morrisjames.com

Attorneys for Defendants ZyXEL Communications, Inc., ZyXEL Communications Corporation, and ADTRAN, Inc.